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1	RICHARD A. HARRIS, ESQ. Nevada State Bar No. 505		
2	JOSHUA HARRIS, ESQ. Nevada State Bar No. 9580		
3	RICHARD HARRIS LAW FIRM 801 S FOURTH ST.		
4	LAS VEGAS NV 89101 Ph: (702) 444-4392		
5	Fax: (702) 444-4455 Email: josh@richardharrislaw.com Attorney for Plaintiff		
6 7	Attorney for Framitin		
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13	JENAIL H. NEWTON,	Case No. 2:18-cv-00971- GMN-GWF	
14	Plaintiff,	SECOND STIPULATION AND	
15		[PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE MOTION FOR REMAND	
16	vs.	MOTION FOR REMAND	
17	COMMISSIONER of Social Security		
18	Defendant.		
19	Comes now Plaintiff, by and through her attorney, RICHARD HARRIS, ESQ., and		
20	requests a THIRTY-ONE (31) calendar day extension of time, to file the MOTION TO FOR		
21	REMAND, up to and including November 19, 2018.		
22	Plaintiff's current deadline to file the MOTION FOR REMAND is October 19, 2018.		
23	The Appellate Attorney Writer has been sick with the flu, thereby necessitating this		
2425	extension request.		
26	Via email on October 17, 2018 at 12:48 pm, opposing counsel expressed no objection to the		
27	extension.		
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2	It is therefore respectfully requested that Plaintiff be granted a FOURTEEN (14) calendar	
3	day	
4	extension of time to file the MOTION FOR REMAND up to and including	
5	November 19, 2018.	
6		
7	DATED this 17 th day of October 2018. DATED this 17 th day of October 2018.	
8	<u> s Joshua Harris</u> <u> s Tina Haicker</u> JOSHUA HARRIS, ESQ. DAYLE ELIESON	
9	Nevada State Bar No. 9580 Richard Harris Law Firm United States Attorney District of Nevada	
10	801 S Fourth St. Las Vegas NV 89101 TINA NAICKER, CSBN 252766 Special Assistant United States Attorney	
11	Ph: (702) 444-4392 160 Spear Street, Suite 800 Fax: (702) 444-4455 San Francisco, California 94105	
12	Email: josh@richardharrislaw.com Attorney for Plaintiff Telephone: (415) 268-5611 Facsimile: (415) 744-0134	
13	E-Mail: Tina.Naicker@SSA.gov	
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16	IT IS SO ORDERED.	
17 18	Leonge Foley Jr.	
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20	United States Magistrate Judge DATED: 10-18-2018	
21	DATED: 10-16-2016	
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